

**Exhibit #13 - 1.28.25 Letter to Arbitrators
Regarding Clarification on Order of
1.17.25 Moving to Final Award Absent
Depositions and Hearings**

28 January, 2025

Howard C. Edelman
Hon. Dennis Cavanaugh
Michael G. Berger
American Arbitration Association
120 Broadway
New York, NY 10016
cc: Ms. Heather Santo, Ms. Michele Gomez, Ann Lesser, Esq.
AAA Case No. 01-16-0001-7288

URGENT: SECOND REQUEST FOR ACCOMPANYING PANEL OPINION OF JANUARY 17, 2025 PER ITS ORDER OF NOVEMBER 21, 2024

Arbitrators Edelman, Cavanaugh and Berger:

Per the Order of the Panel issued on November 21, 2025 regarding Renewed Motions for Summary Judgement and Dismissal of Claimant Fox News Network's ("Fox") Counterclaim for Breach of Contract, this communication serves as Claimant Tantaros' **second** request from the full Panel for a formal, legal opinion as to why it refused to acknowledge Tantaros' Resubmitted Motions for Summary Judgement and Motion for Dismissal of Counterclaimant Fox's claim for Breach of Contract citing a preponderance of evidence regarding both motions.

The Order not only fails to acknowledge these motions, but also Claimant Tantaros' commensurate request for immediate hearing / oral argument. In contrast, The Panel granted Fox's Request for a fifth Motion to Dismiss via letter and scheduled the very first oral argument of the nine (9) year long arbitration proceedings on November 11, 2024 (1).

Pursuant to the Arbitration Clause in Claimant Tantaros' Employment Agreement, ***"The arbitrators shall issue a full, written opinion setting forth the reasons for their decisions."*** (See: "Arbitration Clause", AAA Case Docket 01-16-0001-7288).

The full, three-member Panel is legally required to provide a comprehensive legal opinion for any action taken to accompany all three arbitrators' decisions and orders.

The response to this request predates any Panel decision of January 17, 2025 to close the record and "issue a Final Decision and Award no later than February 7, 2025" absent an opportunity to file a Motion for Reconsideration, and most importantly, depositions and final bifurcated hearings to ensure a separate hearing on punitive and compensatory damages and reimbursement of costs and attorneys fees. (2)

The full Panel's contractually-required opinion is overdue. Claimant Tantaros' original request was made on January 20, 2025 and reiterates the urgency of receiving same no later than Friday, January 30, 2025.

Respectfully submitted,

_____/s/_____

Andrea K. Tantaros

- (1) The Panel dismissed The Fox Parties' last Motion for Dismissal of Claimant's claims on August 15, 2024 ***with prejudice***.
- (2) Arbitrator Deposits for final hearings have been errantly collected from Tantaros as cited by the Panel on February 12, 2024.